

## **REMARKS/ARGUMENTS**

Claims 11-23 are pending in this application. Claims 11-16, 18, 20, 22, and 23 stand rejected, and claim 7, 19, and 20 are withdrawn from consideration. In light of the remarks set forth below, Applicant respectfully submits that each of the pending claims is in immediate condition for immediate allowance.

Claims 11, 12, 14-16, 18, 22, and 23 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent No. 4,998,591 (“Zaunberger”) in view of U.S. Patent No. 3,197,962 (“Suttles”). Applicant respectfully requests reconsideration and withdrawal of this rejection.

Among the limitations of independent claim 11 not present in the cited combination is “at least two energy sources which can be operated independently of one another, each of said energy sources providing electric current to said traction drive and said electric steering drive.”

Applicant notes that in a track vehicle, as the drive system fails, the vehicle should be drivable and steerable, even with partial damage to the drive system in order to move itself, for example, out of a danger zone under its own power or with reduced drive power. (Application as filed, paragraph [0003]). The pending claims explicitly recite that the electric steering drive system includes at least two energy sources which can be operated independently of one another with said energy sources providing electric current to said traction drive and said electric steering drive.

The Office Action acknowledges that the Zaunberger lacks two energy sources. The Examiner then includes Suttles for “the use of two engines as separately controllable energy sources for a powered control vehicle”. Applicant submits that Suttles fails to disclose the limitation for which it is cited.

Suttles discloses an auxiliary power source for a motor vehicle. Specifically, Suttles discloses a principal engine 12 and a booster engine 38. During normal operation of the vehicle, booster engine 38 is turned off. When an extreme power demand is made on the principal engine 12, the vehicle operator may start the booster engine 38. (Suttles at col. 2, ll. 13-44). When the power of the booster engine 38 is no longer needed, the operator may stop the operation of the booster engine 38. The principal engine 12 can operate independently of the booster engine to accommodate normal power requirements of the vehicle. (Suttles at col. 3, ll. 36-47). However, there is no disclosure that booster engine 38 can operate independently of the principal engine 12. In fact, given the clutch mechanism described with respect to Fig. 3 of Suttles and the linking of the principle engine 12 and booster engine 38 by V- belt 34 shown in Fig. 1, it is clear that the booster engine 38 cannot be operated independent of the principal engine 12 to provide power to the vehicle. The cited combination fails to disclose, “two energy sources which can be operated independently of one another, each of said energy sources providing electric current to said traction drive and said electric steering drive.” Thus, for at least this reason the cited combination fails to render independent claim 11 unpatentable.

Applicant notes that one skilled in the art would find no suggestion to apply the teaching of Suttles to a track the vehicle. Further, there is no suggestion or disclosure to apply one motor, i.e., the principal motor 12, to the driving system and the other motor, i.e., booster motor 38, to a steering system. In fact, if one were to combine Zaunberger and Suttles, the result would be Zaunberger’s engine 14 having a booster motor that can be engaged to assist engine 14 when there is an excessive power demand. Thus, in addition to not disclosing that each of the two energy sources can be operated independently of one another and providing electric current to said traction

drive and said electric steering drive, there is no disclosure that the two motors in Suttles can be used for any other purpose than simultaneously powering the vehicle.

For at least these reasons, claims 11, 12, 14-16, 18, 22, and 23 are allowable over the combination of the combination of Zaunberger and Suttles.

Claims 13 and 20 stand rejected under 35 USC §103(a) as being unpatentable over Zaunberger and Suttles in view of U.S. Patent No.: 4,917,200 ("Lucius"). Applicant respectfully requests reconsideration and withdrawal of this rejection.

Lucius was not added to cure the deficiency of the primary combination discussed above but to show additional limitations which, even if it was to show, do not cure the deficiencies discussed above. As such, claims 13 and 20 are deemed to be allowable over the cited combination.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,  
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